

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF MISSOURI  
3 EASTERN DIVISION  
4

5 RITA C. WORCH,  
6 JOSEPH A. WORCH,

7 PLAINTIFFS,

8 vs.

9 WOLPOFF & ABRAMSON, LLP,  
10 KEVIN S. GRILLION, and  
KELLERMAN INVESTIGATIONS,  
LTD.,

DEFENDANTS.

CASE NO. 4:05CV1884-HEA

JURY TRIAL DEMANDED

11  
12  
13 DEPOSITION OF RITA C. WORCH  
14 TAKEN BY MICHAEL J. PAYNE, ESQ.  
ON BEHALF OF THE DEFENDANTS  
15 SEPTEMBER 14, 2006  
16

17 REPORTED BY SUSAN M. FIALA  
18 CERTIFIED COURT REPORTER  
REGISTERED PROFESSIONAL REPORTER  
19

20  
21 ATKINSON-BAKER COURT REPORTERS  
22 500 N. BRAND BLVD., THIRD FLOOR  
23 GLENDALE, CALIFORNIA 91203  
24 (800) 288-3376  
25

15 you have any reason to dispute it?

16 A. I don't know what the number was.

17 Q. You don't know?

18 A. I'm sorry. I don't know.

19 Q. Okay. Are you aware that at some point you  
20 became delinquent on your MBNA America bank card?

21 A. Yes.

22 Q. And you acknowledge that you owed -- and I'm  
23 not talking about specific amounts right now, but  
24 that you owed a debt as a result of your use of the  
25 MBNA America bank card?

9

1 A. Yes.

2 Q. Okay. Are you aware that an arbitration  
3 award has been entered?

4 A. Yes.

5 Q. Have you done anything to dispute the  
6 arbitration award?

7 A. No, I didn't.

8 Q. Have you -- first of all, before today have  
9 you ever heard of wolpoff and Abramson, LLP?

10 A. Yes.

11 Q. When was the first time you heard of them?

12 A. Back in November of 2004.

13 Q. And how did you first hear of them?

14 A. The very first time I heard of them was a  
15 phone call that I received.

16 Q. Did -- how do you know that the individual

14 A. No.

15 Q. At any point in this correspondence do you  
16 request a verification of the debt or the account?

17 A. Well, I told them I disputed it because  
18 there was a lot of interest and fees. You know,  
19 because they were starting to add on a lot of excess  
20 fees.

21 Q. But I think what I'm getting at is at any  
22 point in this correspondence do you ask for a  
23 verification of the debt or the account?

24 A. I guess I thought I was in what I said, but  
25 I mean, I don't actually come out and say it.

24

1 Q. So that's not incor -- embodied in this  
2 correspondence; a request for verification?

3 A. Not in so many words, no.

4 Q. Okay. In any words is there a request for a  
5 verification in this letter?

6 A. Well, I'm telling them I dispute the amount.  
7 I guess in my mind that was -- but no, I don't  
8 actually come out and say prove the debt.

9 Q. Okay. Did you ever send any other  
10 correspondence to Wolpoff and Abramson?

11 A. Did I ever send any other correspondence? I  
12 don't think I did, no.

13 Q. Okay.

14 A. I don't remember sending them anything from  
15 myself, no.